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15 ATTORNEYS FOR PLAINTIFFS

16 UNITED STATES DISTRICT COURT  
17 NORTHERN DISTRICT OF CALIFORNIA  
18 SAN FRANCISCO

19 PHILLIP BELL JR.; LORNA BARNES; AND CASE NO: 3:24-cv-05545-JCS

20 PLAINTIFFS' CASE MANAGEMENT STATEMENT  
21 ANTHONY BARNES. DATE: NOVEMBER 20, 2024

22 PLAINTIFFS, TIME: 2:00PM

23 JUDGE: HONORABLE JOSPEH C. SPERO

24 v.

25 SADDLEBACK VALLEY UNIFIED SCHOOL  
26 DISTRICT; KLUTCH SPORTS;  
27 NEXT LEVEL SPORTS  
28 & ACADEMICS; AND ISAHIA SANDOVAL;  
EDWARD WONG TRICIA OSBORNE,  
CHAD JOHNSON; STEVE BRISCO,  
AND DOES 1-20 IN THEIR  
INDIVIDUAL AND OFFICIAL CAPACITIES.

DEFENDANTS.

**I. JURISDICTION**

1 PLAINTIFF'S COMPLAINT INVOKES FEDERAL QUESTION JURISDICTION BY SUING FOR DAMAGES UNDER 42 U.S.C.  
2 1983. PLAINTIFF AND DEFENDANT AGREE THAT THIS COURT HAS PERSONAL JURISDICTION OVER THE DEFENDANT  
3 AND THAT VENUE IN THE NORTHERN DISTRICT OF CALIFORNIA IS PROPER UNDER 28 U.S.C. §§ 1391(B)(1) AND  
4 (B)(2).  
5

**II. SERVICE**

6 DEFENDANT KLUTCH SPORTS HAS BEEN SERVED, AND PROOF OF SERVICE HAS BEEN FILED WITH THE COURT VIA  
7 ECF.  
8

9 DEFENDANTS STEVE BRISCO AND NEXT LEVEL SPORTS HAVE BEEN SERVED, AND PROOFS OF SERVICE HAVE BEEN  
10 FILED WITH THE COURT VIA ECF.  
11

12 SERVICE ON SADDLEBACK VALLEY UNIFIED SCHOOL DISTRICT, EDWARD WONG, TRICIA OSBORNE, AND CHAD  
13 JOHNSON HAS BEEN COMPLETED, AND PLAINTIFFS ARE AWAITING RECEIPTS FOR PROOF OF SERVICE FROM THEIR  
14 PROCESS SERVER.  
15

16 SERVICE ON ISAIAH SANDOVAL HAS BEEN ATTEMPTED MULTIPLE TIMES; HOWEVER, PLAINTIFFS HAVE BEEN  
17 UNABLE TO LOCATE THE DEFENDANT AND BELIEVE THAT HE IS ACTIVELY AVOIDING SERVICE.  
18

**III. FACTS**

20 PHILLIP III, A TALENTED STUDENT-ATHLETE AND FOOTBALL PLAYER, INITIALLY THRIVED UNDER THE  
21 SHARED CUSTODY OF HIS FATHER (FATHER) AND MOTHER (SAMANTHA) IN SACRAMENTO, CALIFORNIA. WHEN  
22 SAMANTHA REMARRIED SANDOVAL, TENSIONS ROSE AS SANDOVAL ARRANGED FOR PHILLIP III TO ATTEND A  
23 HIGH SCHOOL IN SOUTHERN CALIFORNIA, VIOLATING THE SHARED CUSTODY AGREEMENT. FATHER, WHO HAD  
24 HOPED PHILLIP III WOULD ATTEND A CATHOLIC SCHOOL, WAS NOT CONSULTED ABOUT THIS MOVE, WHICH  
25 PROMISED FINANCIAL COMPENSATION AND POTENTIAL NIL (NAME, IMAGE, LIKENESS) DEALS FOR PHILLIP III.  
26  
27  
28

1 UPON MOVING TO LOS ANGELES WITH SAMANTHA AND SANDOVAL, PHILLIP III'S WELL-BEING  
2 DETERIORATED DUE TO SANDOVAL'S ALLEGED DRUG USE, DOMESTIC VIOLENCE, AND NEGLECTFUL LIVING  
3 CONDITIONS, WHICH INCLUDED EPISODES OF PHYSICAL ABUSE AND LACK OF FOOD. DISTRESSED, PHILLIP III  
4 FREQUENTLY CALLED FATHER AND HIS GRANDPARENTS (GRANDMA AND GRANDPA) FOR HELP. ALARMED,  
5 FATHER AND THE GRANDPARENTS FILED A COURT PETITION TO BRING PHILLIP III BACK TO SACRAMENTO, WHICH  
6 THE COURT GRANTED, ORDERING HIS RETURN TO HIS FORMER CATHOLIC HIGH SCHOOL AFTER HIS FIRST SEMESTER  
7 IN LOS ANGELES. DESPITE THIS, SAMANTHA AND SANDOVAL CONCEALED PHILLIP III'S LOCATION AND  
8 DISREGARDED THE COURT ORDER.

9 FOLLOWING SAMANTHA'S DEATH UNDER SUSPICIOUS CIRCUMSTANCES, SANDOVAL RETAINED CONTROL  
10 OVER PHILLIP III, WITH HELP FROM SEVERAL DEFENDANTS. DISTRICT OFFICIALS AT MISSION HIGH SCHOOL,  
11 AWARE OF THE COURT ORDER, FACILITATED PHILLIP III'S CONTINUED ENROLLMENT AND TOOK MEASURES TO  
12 HIDE HIM FROM FATHER AND HIS GRANDPARENTS. SANDOVAL ENROLLED PHILLIP III IN A CONTRACTUAL NIL  
13 ARRANGEMENT WITH KLUTCH SPORTS WITHOUT FATHER'S KNOWLEDGE OR CONSENT.

14 DEFENDANTS, INCLUDING SCHOOL DISTRICT OFFICIALS AND ASSOCIATED SPORTS AGENCIES, ALLEGEDLY  
15 WORKED TO ALIENATE PHILLIP III FROM HIS BIOLOGICAL FAMILY, PROVIDING HOUSING, FINANCIAL RESOURCES  
16 AND OTHER INDUCEMENTS TO KEEP HIM IN LOS ANGELES. DESPITE A CEASE-AND-DESISS LETTER, THEY  
17 CONTINUED TO PROMOTE PHILLIP III'S ATHLETIC CAREER, EVEN TAKING HIM ON OUT-OF-STATE TRIPS AND  
18 OFFERING LUXURY OPPORTUNITIES RESERVED FOR TOP ATHLETES. THROUGHOUT, DEFENDANTS ALLEGEDLY  
19 FAILED TO PROVIDE PHILLIP III THE COUNSELING HE NEEDED FOLLOWING SAMANTHA'S DEATH, DESPITE BEING  
20 AWARE OF THE SITUATION.

21 PLAINTIFFS CLAIM THAT THE DEFENDANTS EXPLOITED PHILLIP III'S ATHLETIC POTENTIAL AND VIOLATED  
22 BOTH LEGAL AND ETHICAL OBLIGATIONS, CAUSING SIGNIFICANT EMOTIONAL DISTRESS FOR PHILLIP III AND  
23 FURTHER STRAIN ON HIS RELATIONSHIP WITH HIS BIOLOGICAL FAMILY.

1 **IV. LEAGL ISSUES**

2 NONE AT THIS TIME, OUTSIDE OF THE ALLEGATIONS AND CAUSES OF ACTION IN THE COMPLAINT.

3 **V. MOTIONS**

4 NONE AT THIS TIME.

5 **VI. AMEDING THE COMPLANT, ANSWER. COUNTERCLAIM**

6 NONE AT THIS TIME; HOWEVER, PLAINTIFF INTENDS TO AMEND THE COMPLAINT ONCE ALL PARTIES HAVE BEEN  
7 SERVED AND PROOF OF SERVICE HAS BEEN FILED WITH THE COURT.

9 **VII. EVIDENCE PRESERVATION**

10 COUNSEL FOR THE FILING PARTY HAS EACH REVIEWED THE NORTHERN DISTRICT OF CALIFORNIA ESI  
11 GUIDELINES AND WILL TAKE ALL NECESSARY STEPS TO PRESERVE ALL DOCUMENTS, ELECTRONIC OR  
12 OTHERWISE, RELATED TO THIS MATTER.

14 **VIII. INITIAL DISCLOSURES**

16 THE FILING PARTY WILL COMPLY WITH THE INITIAL DISCLOSURE REQUIREMENTS OF FRCP 26 AND WILL PICK A  
17 DATE ONCE REMAINING PARTIES ARE SERVED.

19 **IX. DISCOVERY**

20 NO DISCOVERY HAS OCCURRED YET. THE FILING PARTY DOES NOT BELIEVE A DISCOVERY CONFERENCE  
21 IS NECESSARY AT THIS TIME.

23 **X. CLASS ACTIONS**

25 THIS IS NOT A CLASS ACTION.

26 **XI. RELATED CASES**

27 NONE.

1 **XII. RELIEF SOUGHT**

2 PLAINTIFF SEEKS GENERAL MONETARY DAMAGES, SPECIAL DAMAGES, PUNITIVE AND EXEMPLARY DAMAGES,  
3 ATTORNEY'S FEES, AND STATUTORY DAMAGES AS ALLOWED BY LAW.

4 **XIII. SETTLEMENT**

5 FILING PARTY HAS NOT AGREED TO A SETTLEMENT CONFERENCE

6 **XIV. CONSENT TO MAGISTRATE JUDGE FOR ALL PURPOSES**

7 THE FILING PARTY CONSENTED TO HAVE A MAGISTRATE JUDGE HEAR THIS CASE FOR ALL PURPOSES.

8 **XV. NARROWING OF ISSUES**

9 AT THIS TIME, NARROWING THE ISSUES IS NOT NECESSARY. THE ISSUES MAY BE NARROWED OR DISPOSED OF BY  
10 MOTIONS FOR SUMMARY JUDGMENT/PARTIAL SUMMARY JUDGMENT.

11 **XVI. EXPEDITED TRIAL PROCEDURES**

12 AT THIS TIME, THE CASE DOES NOT APPEAR TO BE THE TYPE OF CASE THAT COULD BE APPROPRIATELY HANDLED  
13 UNDER THE EXPEDITED TRIAL PROCEDURE OF GENERAL ORDER No. 64,

14 **XVII. PRETRIAL SCHEDULE AND TRIAL DATE**

15 PLAINTIFF PROPOSES THE DATES BELOW AND WILL FINALIZE THE DATES ONCE ALL PARTIES RESPOND.

16 A. INITIAL DISCLOSURES: JANUARY 21, 2025

17 B. CUT-OFF OF NON-EXPERT DISCOVERY: DECEMBER 15, 2025

18 C. MID-STATUS DISCOVERY CONFERENCE: JANUARY 29, 2026

19 D. EXPERT WITNESSES: DISCLOSURE: MARCH 9, 2026; REBUTTAL: MARCH 23, 2026;

20 COMPLETION: APRIL 6, 2026

21 E. DISPOSITIVE MOTIONS: MAY 6, 2026

1 F. PRETRIAL CONFERENCE: AUGUST 4, 2026

2 G. TRIAL: AUGUST 17, 2026

3 **XVIII. TRIAL**

4 THIS WILL BE A JURY TRIAL, AND THE FILING PARTY BELIEVES THE TRIAL WILL LAST 10-12 DAYS.

5 **XIX. DISCLOSURE OF NON PARTY INTERESTED ENTITIES OR PERSONS**

6 AS OF THIS DATE, THERE ARE NO SUCH INTERESTS TO REPORT.

7 **XX. GUIDELINES FOR PROFESSIONAL CONDUCT**

8 COUNSEL FOR THE FILING PARTY HAS REVIEWED THE GUIDELINES FOR PROFESSIONAL CONDUCT FOR THE  
9 NORTHERN DISTRICT.

10 **XXI. OTHER MATTERS**

11 THE FILING PARTY REQUEST THAT THE COURT RESCHEDULE A CASE MANAGEMENT CONFERENCE ONCE ALL  
12 PARTIES HAVE FILED AND RESPONSE TO THE COMPLAINT.

13 Submitted ,  
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**Counsel For Plaintiffs**

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